

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF NEW YORK

**CASE NO: 12-CR-125-S**

UNITED STATES OF AMERICA,

Plaintiff,

v

JOEL MARCUS,

Defendant.

Motion by: Richard L. Rosenbaum, Esq., Counsel for Joel Marcus

DATE, TIME & PLACE: Before Hon. Hugh B. Scott, United States District  
Court, 2 Niagara Square, Buffalo, NY

RELIEF REQUESTED: Motion for Enlargement of Time to File Pre-Trial Motions

DATE: December 23, 2015, Ft. Lauderdale, FL  
Richard L. Rosenbaum, Esq.  
Law Offices of Richard Rosenbaum  
888 SE 3<sup>rd</sup> Avenue, #500  
Ft. Laud., FL 33316  
954-522-7007  
Fla. Bar # 394688  
Richard@RLRosenbaum.com

TO: AUSA Jack Rogowski

**UNOPPOSED MOTION FOR ENLARGEMENT OF TIME IN WHICH  
TO FILE PRE-TRIAL MOTIONS**

COMES NOW, the Defendant, Joel Marcus, by and through the undersigned counsel, and respectfully requests this Honorable Court enter an Order enlarging the time in which pre-trial motions may be filed up to and including 60 days from the date such relief is granted, and as grounds and in support thereof states as follows:

1. The Defendant has been charged by Indictment with criminal offenses.
2. The Defendant entered a plea of not guilty.
3. Pre-trial motions are due to be filed.
4. Undersigned counsel is unable to finalize the Defendant's pre-trial motions.

5. The discovery in this matter is voluminous with multiple Defendants.
6. AUSA John Rogowski has advised that the Government does not object to the relief sought herein.
7. Undersigned counsel request up to and including 60 days from the date such relief is granted in which to file the contemplated motions.
8. It is agreed that the extension granted would be excluded from any speedy trial time and the time would be tolled.

WHEREFORE, the Defendant, Joel Marcus, respectfully moves this Honorable Court enter an Order enlarging the time in which pre-trial motions may be filed up to and including 60 days from the date such relief is granted.

I hereby certify that on **December 23<sup>rd</sup>**, 2015, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record via transmission of Notices of Electronic Filing generated by CM/ECF.

Respectfully submitted,

LAW OFFICES OF RICHARD ROSENBAUM  
*Primary Email: Pleadings@RLRosenbaum.com*  
*Secondary Email: Richard@RLRosenbaum.com*

**S/RICHARD L. ROSENBAUM**  
Richard L. Rosenbaum, Esq.  
Fla. Bar No: 394688  
888 Southeast 3rd Avenue  
Suite 500  
Fort Lauderdale, FL 33316  
Telephone (954) 522-7007  
Facsimile: (954) 522-7003